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November 14, 2005

Carlyn Winter Prisk (3HS62)
USEPA – Region III
1650 Arch Street
Philadelphia, PA 19103

SDMS DocID 2057751

Re: Follow-up 104(e) Request – Atlantic Richfield
Lower Darby Creek Area Superfund Site
Delaware and Philadelphia Counties, PA

Dear Ms. Prisk:

The Atlantic Richfield Company ("Atlantic Richfield") received the United States Environmental Protection's ("USEPA") letter dated August 9, 2005 ("Follow-up 104(e)") on October 19, 2005 due an incorrect address. On October 20, 2005, Bonnie Pugh Winkler, Esq. granted an extension for Atlantic Richfield's response until November 30, 2005.

USEPA's request in the Follow-up 104(e):

Please review the enclosed interview summary indicating that waste was disposed by ARCO at the Folcroft Landfill and waste tickets indicating that ARCO was a customer of Tri-County Hauling, Inc. EPA requests that ARCO respond to the February 19, 2002 Information Request (copy enclosed) based on this information.

Atlantic Richfield has reviewed the Follow-up 104(e) and attached Interview Summary of Confidential Source #11 and submits the following response.

Objection 1: Atlantic Richfield objects to the conclusion that the interview summary indicates that "waste was disposed by ARCO at the Folcroft Landfill." In light of the fact that there was no audio/video record or transcript made of the interview questions and answers or the context of each, it is difficult to evaluate the accurateness or veracity of the statements made by the interviewee. For example, the witness purports to identify an "Arco/Gulf Refining" company that used dump trucks. Based on our corporate records there has never been an "ARCO/Gulf Refining" entity affiliated with the Atlantic Richfield Company.

Carlyn Winter Prisk (3HS62)

USEPA – Region III

November 14, 2005

Page - 2 -


ORIGINAL

Objection 2. Atlantic Richfield cannot respond to the second conclusion drawn by USEPA regarding the "waste tickets indicating that ARCO was a customer of Tri-County Hauling, Inc." since the waste tickets were not included in the information supplied with the Follow-up 104(e). Upon receipt of such information from USEPA, Atlantic Richfield will respond to this allegation.

Response: Atlantic Richfield hereby incorporates by reference all general objections, specific objections and responses provided in Atlantic Richfield's response dated July 31, 2003.

There is nothing contained in the Follow-up 104(e) or the Interview Summary of Confidential Source #11 that necessitates any change in any of the responses that Atlantic Richfield provided in its Atlantic Richfield's response dated July 31, 2003.

Sincerely,



Todd L. Normane

Counsel to Atlantic Richfield Company

cc: Bonnie Pugh Winkler, Esq., USEPA ORC